

Yacovone, Krista

From: DiPippo, Gary <Gary.DiPippo@Cornerstoneeg.com>
Sent: Wednesday, July 22, 2015 3:49 PM
To: Gorin, Jonathan
Cc: Cardiello, Frank; Scott MacMillin (SMacMillin@brwncald.com); dtoft@wolffsamson.com; relampkin@ashland.com; Anne.Pavelka@dep.state.nj.us; John M. Hoffman; Carrie McGowan
Subject: LCP, 2nd Quarter 2015, Progress Report
Attachments: L072215JG(Q2_2015)ProgRep.pdf

Good afternoon Jon.

On behalf of IES, attached is the second quarter of 2015 progress report for the LCP Chemicals, Inc. Superfund site. Paper copies will be sent via US Mail.

Please contact either John Hoffman of Ashland Inc. or me, should you have questions or comments.

Thank you

Gary DiPippo

Region Vice President



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VIA E-MAIL AND US MAIL

July 22, 2015

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region 2
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: 2nd Quarter 2015 Progress Report
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following is the final progress report submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Consent Order) issued by USEPA and as executed by IES on May 13, 1999. This final progress report also serves as the termination report in satisfaction of the Section XXVI.97 of the Consent Order. On February 4, 2014, IES requested a change in the reporting frequency required by the Consent Order from monthly to quarterly, and in an electronic mail message dated February 4, 2014, the USEPA approved of the change. This is the second quarter progress report, for the period from April 1 to June 30, 2015.

In August 2013, the USEPA approved the *Remedial Investigation Report (RIR)*, *Human Health Risk Assessment (HHRA)*, *Baseline Ecological Risk Assessment (BERA)*, and *Feasibility Study (FS)*, as such, the work requirements of the Statement of Work (SOW) in the Consent Order have been met and no further work is required or contemplated under the Consent Order. Accordingly, IES requests that USEPA terminate all progress reports under the Consent Order since all requirements of the Consent Order have been completed and approved.

IES believes that it has paid all oversight costs to the USEPA and has satisfied this requirement in accordance with Section XX of the Order.

1. Previous Actions in Compliance with the Order

- A. The following actions were taken to comply with the Order during the previous reporting period:
 - Since the specific work requirements of the Consent Order have been completed and approved, there is no additional work to be conducted under the Consent Order.
- B. The following documents were submitted to the agencies during the previous reporting period:
 - Quarterly progress letter report dated April 1, 2015.
- C. The following agency approvals were received during the previous reporting period:
 - None during the reporting period concerning the Consent Order.
- D. The following agency documents and correspondences were received during the previous reporting period:
 - None during the reporting period concerning the Consent Order.
- E. Other pertinent communications with the agencies during the previous reporting period:
 - None during the reporting period concerning the Consent Order.

2. Future Actions, Data, and Plans

- A. As previously noted, with the USEPA approval of the RIR, HHRA, BERA, and FS, the RI/FS work requirements of the Consent Order have been met, and therefore, no specific future actions have been defined at this point.
- B. Other information related to the progress of work:
 - None during this reporting period.

3. Project Schedule

- A. As noted above, there are not any work items for which a schedule is currently defined, and, therefore, a schedule is not included with this progress report.

- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
 - The work required by the Consent Order is completed.
- C. Description of efforts made to mitigate these delays or anticipated delays:
 - The work required by the Consent Order is completed.

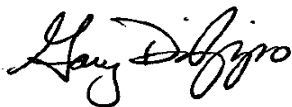
4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002. IES requests that all funding assurance mechanisms under the Consent Order be terminated since all requirements of the Consent Order have been completed and approved.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3233.

Sincerely,

CORNERSTONE ENGINEERING GROUP, LLC



Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.
S. Miller, NJDHSS
F. Cardiello, Esq., USEPA
A. Pavelka, NJDEP

C. McGowan, EHS Support
S. MacMillin, Brown and Caldwell
William Hatfield, Esq.
R. Lampkin, Ashland